

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	Criminal No. _____
v.	:	Date Filed: _____
EDWARD MARTIN	:	Violations:
	:	21 U.S.C. § 841(a)(1)
	:	(Distribution of cocaine base (“crack”)
	:	- 1 count)
	:	21 U.S.C. § 860(a)
	:	(Distribution of cocaine base (“crack”)
	:	within 1000 feet of a school - 1 count)
	:	18 U.S.C. § 922(g)(1)
	:	(Possession of a firearm and ammunition
	:	by a convicted felon - 2 counts)
	:	18 U.S.C. § 924(d) and 28 U.S.C. §2461(c)
	:	(Notice of forfeiture)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about January 5, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

EDWARD MARTIN

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 5, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

EDWARD MARTIN

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within one thousand feet of the real property comprising the W. C. Longstreth Elementary School, a public elementary school, located at 5700 Willows Avenue, Philadelphia, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 5, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

EDWARD MARTIN,

having been previously convicted in a Court of the Common Pleas of Pennsylvania of an offense punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate commerce, a loaded firearm, that is, a Companhia (CIA) Brasilibra De, Model 251, single shot, 20 gauge shotgun, serial number 29-054452.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 5, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

EDWARD MARTIN,

having been previously convicted in a Court of the Common Pleas of Pennsylvania of an offense punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate commerce, ammunition, that is, four Federal, 20 gauge, shotgun shells.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

As a result of the violations of Title 18, United States Code, Section 922(g)(1) set forth in Counts Three and Four of this Indictment, the defendant

EDWARD MARTIN

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), the firearm and ammunition involved in the commission of these offenses, including, but not limited to:

Companhia (CIA) Brasilibra De, Model 251, single shot, 20 gauge
shotgun, serial number 29-054452 and four live rounds of ammunition

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney